

From: [KENT Mavis D](#)
To: [Hersey, Kasey D](#); [Chip Humphrey/R10/USEPA/US@EPA](#)
Cc: [Gresh, Roger T](#); [Wilson, Teresa A](#); [junderwood@qmg-inc.com](#)
Subject: RE: Sept 2008 Gould Inspection Report
Date: 04/16/2009 02:20 PM

Thanks for the responses.

From: Hersey, Kasey D [mailto:Kasey.Hersey@amec.com]
Sent: Thursday, April 16, 2009 1:37 PM
To: KENT Mavis D; humphrey.chip@epa.gov
Cc: Gresh, Roger T; Wilson, Teresa A; junderwood@qmg-inc.com
Subject: RE: Sept 2008 Gould Inspection Report

Mavis -

You are correct - the Gould Site is scheduled for quarterly post-closure inspections. No - this is not the normal submittal time for a quarterly report. Ideally, quarterly inspection reports would be issued prior to the subsequent quarterly inspection. Although quarterly inspections are completed on time, we have gotten behind in reporting and are working diligently to get caught up.

The 4th quarter inspection was completed on December 18, 2008. The associated quarterly report is currently going through our internal/client review process and is anticipated to be submitted before the end of April. The 1st quarter 2009 inspection was completed on March 23, 2009. Pending receipt of water sample analytical results from LDS-2, we anticipate submitting the 1st quarter inspection report before the end of May 2009.

With regard to your comments on the 3rd quarter 2008 inspection report, various degrees of settlement across the OCF have been observed during post-closure monitoring, primarily on the northeast (NW Front Ave) and southwest (Metro) sides of the OCF. A maximum depth of 6 inches of subsidence has been observed by AMEC. In 2006, an area that was accumulating water was regraded and reseeded – no other corrective action has been taken, and no significant progression has been noted. We conducted an inspection of the settlement areas last week, and a summary of the settlement observations, including a map showing locations of settlement observed, will be provided with the 1st quarter 2009 inspection report.

Samples of the water that re-accumulates in LDS-2 have been collected on a quarterly basis beginning with the 3rd quarter 2007 inspection.

- Dissolved lead concentrations have always been ND.
- Total lead concentrations have typically been estimated between MDL and MRL (~1ug/L).

The total lead concentration in Sept 2008 (5.40ug/L) was noted as "increased" because it was the highest result reported to date. A table summarizing all analytical results from LDS-2 will be submitted as part of the 4th quarter 2008 inspection report.

Please do not hesitate to let me know if you have any additional questions or concerns.

Thank you,
Kasey Hersey

From: KENT Mavis D [mailto:KENT.Mavis@deq.state.or.us]
Sent: Monday, March 30, 2009 3:13 PM
To: Hersey, Kasey D; humphrey.chip@epa.gov
Cc: Wilson, Teresa A; Gresh, Roger T
Subject: Sept 2008 Gould Inspection Report

I have reviewed the March 30, 2009, report on the September 2008 Gould site inspection and have two comments.

First, the report is tracking minor subsidence on the OCF cap. Can you show the general area, perhaps in a pattern, on the site location map of figure 1? This would give a sense of location and area. The text could give a better sense of the magnitude of the problem. Does minor mean less than an inch, 4 inches, barely discernable? Is this the first instance, or has it been an ongoing observation for the same location, and if so, is it noticeably progressing?

Second, the report indicates that the concentration of lead in LDS-2 is "increased". Is this the first instance of higher concentrations? Can you add a table of historic data (both dissolved and total) related to this issue?

Thanks.

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